



EXCAVATION 'DIG' PERMIT

Region 8 Sustainability & Environmental Management System

1.0 Purpose & Scope

Excavation Permits are required, if:

- Any work is done in a public right-of-way; this is governed by city and local ordinances across all states in Region 8, and
- Special circumstances (e.g., removal of contaminated soils under a government decree, such as a Consent Order)

The Denver Federal Center (DFC) is required to meet requirements set in three Orders on Consent from the State of Colorado. These Orders on Consent are driven by 6 CCR [Code of Colorado Regulations] 1007-2 and 6 CCR 1007-3. These cover the investigation and environmental clean up of soil and groundwater on the DFC. As part of these Orders on Consent, the Excavation Permit process was created to control the movement and distribution of contaminated soils on the DFC. This process is administered by the Environmental Program Group (EPG). The EPG generates the Excavation Permit (permit), which outlines contractor requirements **for all soil handling** on the DFC. This process:

- Provides a safe work environment for contractor employees;
- Ensures that contractor storm water protection meets the Environmental Protection Agency (EPA) issued Municipal Separate Storm Sewer Permit (MS4);
- Prevents relocation of contaminated soil to clean areas on the DFC;
- Provides GSA and the contractor a means to be able to characterize excavated soils for disposal (as non-hazardous or hazardous waste); and
- Protects the public from contaminated soils being used at off site projects.

2.0 Activities & Departments Affected

Regional:

- A permit is required for all excavation activities done in a public right-of-way, unless otherwise excluded.

Denver Federal Center:

- Excavation Permit requirements at the DFC apply to GSA and tenant agencies, excluding the exceptions listed in Section 3.0.

3.0 Exclusions

The following activities are excluded from the DFC excavation permit requirements provided the soil is placed back into the excavation:

- Landscaping work associated with removal of old landscapes, constructing new landscapes, planting flower and shallow bushes, repairing and installing new sprinkler heads and lines, and other activities, which do not exceed more than 18 inches in



EXCAVATION 'DIG' PERMIT

Region 8 Sustainability & Environmental Management System

depth. All landscape materials from this activity is excluded from permitting and manifesting requirements.

- Paving and 8 to 10-inch road base under-pavement is excluded from the permitting and manifesting requirements.

4.0 Forms Used & Permits Required: (include reporting requirements)

☐ **Federal and State Forms and Permits:**

- No Federal or State Permits are required
- Permits are likely for any work done in a public right-of-way; this is governed by city and local ordinances across all states in Region 8, except at the DFC

☐ **In-house GSA Region 8 and Contractor Forms:**

- Excavation Permit Request
- Erosion Control Plan
- Waste Inventory Tracking
- Excavation Inspection Report
- Excavation Permit Tracking Database

5.0 Acronyms, Abbreviations, and Definitions

| Acronyms | Meaning |
|----------|---------------------------------------|
| CCR | Code of Colorado Regulations |
| CO | Contracting Officer |
| DFC | Denver Federal Center |
| COR | Contracting Officers Representative |
| EPA | Environmental Protection Agency |
| EPG | Environmental Program Group |
| GSA | General Service Administration |
| MS4 | Municipal Separate Storm Sewer Permit |
| PBS | Public Building Services |

Definitions:

Environmental Program Group: The group responsible for issuance of excavation permits at the DFC.

GSA or Tenant Project Manager (PM): Person directly responsible for managing / oversight of the project under which the excavation is taking place.

Soil Excavation: Any excavation of soils on the DFC not excluded in Section 3.0.

6.0 Procedure

State Specific Procedures & Requirements [refer to individual State Legal Reviews for details on Statutes, Laws, and Rules]:



EXCAVATION 'DIG' PERMIT

Region 8 Sustainability & Environmental Management System

- There are no State regulations in Region 8 governing excavation permits
- If contamination is of a concern, then state (e.g., 6 CCR 1007-03 for the DFC) and federal regulations do apply
- Ordinances do exist at the city and local level for any excavation work done in a public right-of-way

Standardized Procedure:

- 6.1 For excavation work occurring in public right-of-ways, comply with the city and local excavation permitting ordinances of where the work is planned.
- 6.2 For any non-excluded excavation work at the DFC; excluded work pertains to landscaping and 8 to 10-inch paving, fill out the Permit Request Form (provided by the EPG, Building 41, DFC). Include the Erosion Control Plan. Mark the location of the excavation on the Figure 1 map.
- 6.3 Deliver the completed Permit Request Form to EPG.
- 6.4 EPG follows the *Excavation Permit Procedure, Revision No.10, (latest version)*. EPG checks the *RCRA Pre-RFI Historical Data Report Addendum, 1998*, and any additional reports on the area to determine the extent and nature of contamination. Based on this information the permit requirements will be determined.
- 6.5 EPG will provide the Permit to the requestor with a determination if the soils are presumed clean, potentially contaminated, or contaminated and any storage, handling, and disposal requirements are applicable. The Permit will be signed by both the EPG Program Manager and the GSA Project/Tenant Manager.
- 6.6 EPG tracks Excavation Permit Requests.
- 6.7 The GSA Project Manager shall provide the requestor a signed copy of the Permit. It is the requestor's responsibility to provide the Contracting Officer a copy for inclusion in the contracting project files. An electronic copy of the permit can be requested to facilitate development of SOW.
- 6.8 The EPG will provide contracting language to be included in the SOW after they have determined handling requirements.
- 6.9 The EPG, upon request, can provide general cost information on soil testing, sampling, and disposal.
- 6.10 It is the responsibility of the GSA/Tenant PM and associated Contracting Officer (CO) to share the information in the permit with the excavation contractor to assure compliance with the permit.



EXCAVATION 'DIG' PERMIT

Region 8 Sustainability & Environmental Management System

- 6.11 The GSA/Tenant PM may conduct an inspection of the excavation and complete the Excavation Inspection Report form.
- 6.12 The project CO and requestor should retain copies of the permit with contract and project files.

7.0 Records Management

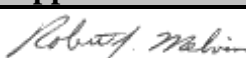
Completed Excavation Permit Request (electronic and hard copy)
Summary of Excavation Permit Request
Completed Excavation Inspection Report

8.0 References

Excavation Permit Procedure, Revision No. 9, March 2004.
RCRA Pre-RFI Historical Data Report Addendum, 1998
FEC Memo regarding Staging Piles

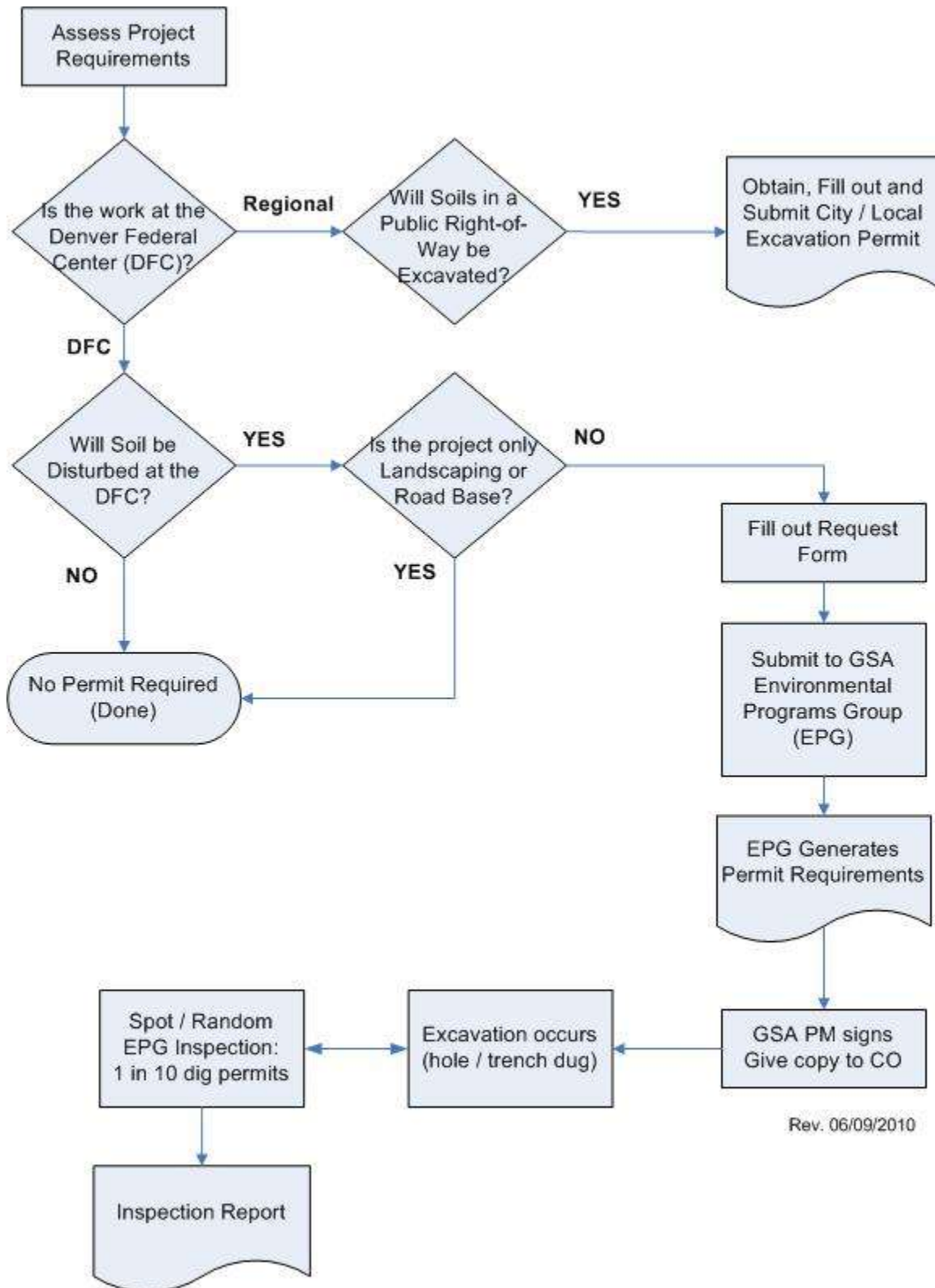
9.0 Appendices

Attachment A: Excavation Permit Flowchart
Attachment B: Excavation Activity Permit, Environmental Program Group (EPG),
Denver Federal Center, Rev. March 27, 2002

| Document Control Information: | Approved & Dated: |
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| Excavation Permit "Month-Date-Year".doc |  June 9, 2010 |

| Document Revision and Update: | | |
|-------------------------------|---|--------------------------------|
| Revision Date | Nature of Revision | Revision made by: |
| 12/19/2005 | Working Draft | Mike Gasser, John Kleinschmidt |
| 03/16/2006 | Original Release | Mike Gasser, John Kleinschmidt |
| 02/01/2010 | Add ISO 14001 Document Controls, add Flowchart | Robert Melvin |
| 04/02/2010 | Update requirements at DFC | Mike Gasser |
| 06/09/2010 | Add state regulations and outline Regional requirements | Robert Melvin, Mike Gasser |

ATTACHMENT A: Excavation Permit Flowchart



Rev. 06/09/2010



EXCAVATION 'DIG' PERMIT

Region 8 Sustainability & Environmental Management System

Attachment B:

Excavation Activity Permit
Environmental Program Group (EPG), Denver Federal Center
Rev. March 27, 2002

Filling Out A Permit Request Form By The GSA Project Manager

1. Is your new project going to excavate soils? **Yes** then continue, **No** then no Permit is required.
2. Fill out the Permit request form (provided by EFG, DFC Building 41) and mark on Figure 1 map the location of the excavation.
3. Deliver filled out Permit request form to EPG.
4. EPG will provide the Permit to the requestor with a determination if the soils are presumed clean, potentially contaminated, or contaminated and the storage, handling, and disposal requirements. The Permit will be signed by both the DFC Environmental Manager and the GSA Project Manager.
5. The GSA Project Manager will send a signed copy (with both signatures) to the Contracting Officer (CO) for inclusion in the contracting project files.
6. EPG will provide contracting language to be included in the SOW after they have determined handling requirements.
7. EPG, upon request can provide general cost information on soil sample collection, analysis (full TCLP), and disposal.
8. All soils leaving the DFC must be under a manifest signed by the DFC Environmental Manager.



EXCAVATION 'DIG' PERMIT

Region 8 Sustainability & Environmental Management System

EXCAVATION PERMIT REQUEST FORM (To be filled out by GSA Project Manager)

All projects involving any degree of excavation will require an Excavation Permit.

Date_____

Project Title_____

GSA Project Manager_____

Contractor Name (if known)_____

Proposed Date of Excavation_____

Excavation Period (days)_____

Reason for Excavation_____

Number of Excavations_____

Approx. depth (ft)_____

Approx. length & width (ft)_____

Proposed method of handling, storage and/or disposal of excavated material:

This section for **EMERGENCY EXCAVATION ONLY**:

Name of EPG representative contacted_____

Date and time of Excavation Authorization_____

LOCATE AND CLEARLY MARK ALL EXCAVATION SITES ON ATTACHED MAP

The Excavation Permit will be issued within 3 days of submittal. All special handling, storage and /or disposal methods will be documented and explained in the issued Permit.

**EXCAVATION 'DIG' PERMIT***Region 8 Sustainability & Environmental Management System*

Excavation Permit Number:

| Erosion Control Plan for DFC Excavation | | |
|--|--|---|
| Location: | | |
| Excavation Start Date: | | End Date: |
| Contractor: | | Project Manager: |
| Terrain Slope Direction: | | |
| Type of Slope: | Steep <input type="checkbox"/> | Mid <input type="checkbox"/> Mostly Flat <input type="checkbox"/> |
| Comments: | | |
| Type of Surface: | Concrete or Asphalt <input type="checkbox"/> | Lawn <input type="checkbox"/> Field <input type="checkbox"/> |
| Comments: | | |
| Distance to Storm Water Inlet: | | feet |
| Type of Inlet: | Storm Drain <input type="checkbox"/> | Area Drain <input type="checkbox"/> McIntyre Gulch <input type="checkbox"/> Ag Ditch <input type="checkbox"/> |
| Comments: | | |
| Best Management Practice(s) Implemented | 1. | |
| | 2. | |
| | 3. | |
| | 4. | |
| GSA EPG Approval | | |
| Signed | | Date |

